

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	No. 03-00169-01-CR-W-NKL
	)	
Plaintiff,	)	COUNTS ONE AND TWO
	)	18 U.S.C. § 2314:
v.	)	Class C Felony
	)	NMT 10 Years Imprisonment
GWENDOLYN BAKER,	)	Fine: NMT \$250,000 or twice the
	)	financial gain
	)	3 Years Supervised Release
Defendant.	)	\$100 Special Assessment

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

1. At all times material to this Information:

a. Defendant GWENDOLYN BAKER, a resident of Memphis, Tennessee, was involved with others, including James R. Nichols and Robert Gomez, in the selling of automobiles and other motor vehicles supposedly being offered for sale by an estate of a wealthy individual who wanted to offer the vehicles for sale at bargain prices, most commonly to individuals of religious faith. The vehicles were sometimes referred to as "miracle cars" or "estate cars."

b. Defendant GWENDOLYN BAKER was involved with the selling of these vehicles starting in approximately October 1998. Part of her responsibilities included receiving purchase money for the vehicles and transmitting it to Nichols and Gomez in California.

c. The selling of the miracle cars or estate cars became the subject of a federal investigation in the Western District of Missouri.

d. In the course of the investigation, (a) on August 28, 2001, Defendant BAKER was interviewed in Memphis, Tennessee, and served with a federal grand jury subpoena for records by an investigator for the State of Missouri assisting in the investigation and a federal agent; (b) on September 24, 2001, Defendant BAKER was interviewed by federal agents in Kansas City, Missouri concerning the investigation; and (c) on September 25, 2001, Defendant BAKER appeared and testified before the federal grand jury conducting the investigation of the sale of the vehicles.

e. After being contacted by agents in connection with the federal investigation, Defendant BAKER sold and caused to be sold vehicles which were supposedly being offered for sale by the estate. Defendant BAKER misrepresented and caused to be misrepresented material facts to the individuals to whom she sold vehicles after August 2001, and omitted and caused to be omitted material facts to those individuals.

f. Randy Lamb of Leawood, Kansas, was one of the individuals to whom Defendant BAKER sold vehicles after Defendant BAKER had been contacted by agents in connection with the federal investigation referred to above.

g. The federal grand jury returned an Indictment against Defendant BAKER, as well as James R. Nichols and Robert Gomez, on May 8, 2002, but the Indictment did not become unsealed and public until June 10, 2002, when Robert Gomez was the first of the defendants to be arrested.

2. On or about April 15, 2002, Defendant GWENDOLYN BAKER did knowingly transport, transmit and transfer, and cause to be transported, transmitted and transferred, in interstate commerce, between the State of Kansas and the State of Tennessee, money represented by a wire transfer of \$20,000 from Randy Lamb from Team Bank, Overland Park, Kansas, to First Tennessee Bank, Memphis, Tennessee, such wire transfer being for the purchase of vehicles by Randy Lamb, in the amount of \$5,000 or more, Defendant BAKER knowing that the money had been stolen, converted and taken by fraud;

All in violation of Title 18, United States Code, Section 2314.

#### COUNT TWO

1. The United States Attorney realleges and incorporates by reference the allegations in paragraph one of Count One of this Information.

2. On or about May 30, 2002, Defendant GWENDOLYN BAKER did knowingly transport, transmit and transfer, and cause to be transported, transmitted and transferred, in interstate commerce,

between the State of Kansas and the State of Tennessee, money represented by a wire transfer of \$13,000 from Randy Lamb from Team Bank, Overland Park, Kansas, to First Tennessee Bank, Memphis, Tennessee, such wire transfer being for the purchase of vehicles by Randy Lamb, in the amount of \$5,000 or more, Defendant BAKER knowing that the money had been stolen, converted and taken by fraud;

All in violation of Title 18, United States Code, Section 2314.

Todd P. Graves  
United States Attorney

By

J. Daniel Stewart  
Assistant United States Attorney

By

James C. Bohling  
Assistant United States Attorney

Dated: May 15, 2003